

1 THE HONORABLE JOHN C. COUGHENOUR
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67 UNITED STATES DISTRICT COURT
8 WESTERN DISTRICT OF WASHINGTON
9 AT SEATTLE

10 NEXT LEVEL VENTURES, LLC,

11 Plaintiff, CASE NO. MC23-0052-JCC
12 v. ORDER
13 AVID HOLDINGS LTD. F/K/A ALDEREGO
14 GROUP LTD.,
15 Defendant.

16 This matter comes before the Court on Plaintiff's application for a supplemental writ of
17 execution (Dkt. No. 29). For the reasons described below, the request is DENIED.

18 In a prior order approving a writ of execution, the Court described the background facts
19 and procedural posture of this matter. (See Dkt. No. 19 at 1–2.) It will not repeat that information
20 here. Since then, little has changed. It appears undisputed that, outside of the sale of certain
21 property subject to that writ, Plaintiff has not collected on the money judgment issued in a
22 related matter, *Next Level Ventures, LLC v. Avid Holdings Ltd.*, No. C22-1083-JCC (W.D. Wash
23 2023). (See generally Dkt. No. 29.)

24 Thus, Plaintiff now seeks a supplemental writ for the following:

- 25 • All rights to and ownership interests in, held, or claimed by AVID in any and
26 all claims, rights, and choses in action, including, without limitation, legal
rights to sue or arbitrate, pending claims, accrued causes of action, rights to
receive payments under a loan or promissory note, rights to sue for breach of

1 contract or enforce performance, rights to collect under an insurance policy
 2 after an insured event occurs, ownership interests conferring dividends or
 3 voting rights, transferable only through legal documentation, checks or
 4 promissory notes evidencing a right to payment, rights to enforce a court
 5 judgment against another party, and rights to sue a trustee, corporate officer,
 6 or agent for wrongdoing. This includes claims against NLV in the Ongoing
 7 Arbitration and Ongoing Litigation: *Avid Holdings Ltd. f/k/a Alderego Group*
 8 *Ltd. v. Next Level Ventures, LLC*, AAA ICDR Case No. 01-23- 0000-8019
 9 and *Avid Holdings Ltd. f/k/a Alderego Group Ltd., Hanna Carfield and*
 10 *Johnathan Carfield v. Alex Kwon et al.*, No. 2:24-cv-8196 (C. D. Cal. Feb. 4,
 11 2025);

- 12 • All rights, title, and interest in and to any websites, website content, domain
 13 names and registrations, and related digital assets, including, without
 14 limitation, avd.com.

15 (Dkt. No. 29-4 at 2–3.)

16 The Court finds compelling reasons precluding the issuance of such a writ. As to the first
 17 item, it would force the sale of Defendant's and/or related parties'¹ interests in remaining legal
 18 disputes with Plaintiff. And to the extent that Plaintiff purchases this asset, as it did following the
 19 prior writ of execution in this matter, (*see* Dkt. No. 28), the disputes would ostensibly terminate.
 20 This result is unjust and, as discussed in the prior order, is a basis to deny or vacate such a writ.
 21 (*See* Dkt. No. 19 at 3 n.3) (citing *Paglia v. Breskovich*, 522 P.2d 511, 512–13 (Wash. Ct. App.
 22 1974); *MP Med. Inc. v. Wegman*, 213 P.3d 931, 936 (Wash. Ct. App. 2009); *United Pac. Ins. Co.*
 23 *v. Lundstrom*, 459 P.2d 930, 936 (Wash. 1969)). As to the second item, the existing writ of
 24 execution includes all intellectual property “claimed by AVID.” (Dkt. No. 20 at 2.) To the extent
 25 the property described above is, indeed, Avid's, it is covered by that writ. And to the extent it is
 26 not, as Defendant now contends, (*see* Dkt. No. 36 at 7–8), the property is not subject to this
 collection action and cannot be included on a writ issued by this Court.

27 Therefore, Plaintiff's application for a supplemental writ of execution (Dkt. No. 29) is
 28 DENIED.

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DATED this 7th day of April 2025.



John C. Coughenour
UNITED STATES DISTRICT JUDGE